

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: LAZEDRIA WILSON**

**CHAPTER 13**

**DEBTOR**

**CASE NO. 16-11494-JDW**

**RESPONSE TO TRUSTEE'S MOTION TO DISMISS [DOCUMENT NO. 49]**

COMES NOW, Lazedria Wilson, by and through her attorney of record and in response to the Trustee's Motion To Dismiss and would show as follows:

Debtor has been on maternity leave and is now back at work. Debtor respectfully requests her case not be dismissed and requests that any arrearage be added back into her plan.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests that the court deny the Trustee's Motion To Dismiss and that she be allowed to catch up on her payments and for such other and further relief that this court deems just and proper under the circumstances.

RESPECTFULLY SUBMITTED,

/s/Robert H. Lomenick, Jr.  
ROBERT H. LOMENICK, MSB #104186  
ATTORNEY AT LAW  
POST OFFICE BOX 417  
HOLLY SPRINGS, MISSISSIPPI 38635  
(662) 252-3224

**CERTIFICATE OF SERVICE**

I, Robert H. Lomenick Jr., Attorney for Debtor, do hereby certify that I have this day forwarded, a true and correct copy of the above and foregoing Response To Motion To Dismiss to the Debtor, either by electronic means or by United States Mail to the following:

**Locke Barkley  
Chapter 13 Trustee  
6360 I-55 North, Ste. 140  
Jackson, Mississippi 39211**

**Office of U.S. Trustee  
501 East Court Street, Suite 6-430  
Jackson, Mississippi 39201**

This the 29<sup>th</sup> day of April, 2019.

/s/ Robert H. Lomenick. Jr.  
ROBERT H. LOMENICK, JR.